The Honorable John H. Chun 1 2 3 4 5 6 UNITED STATES DISTRICT COURT FOR THE 7 WESTERN DISTRICT OF WASHINGTON 8 AT SEATTLE 9 YER YANG MOUA, CASE NO. 2:22-cv-00985-JHC 10 Plaintiff, STIPULATED MOTION AND ORDER FOR EXTENSION OF PRETRIAL 11 **DEADLINES** v. 12 UNITED STATES OF AMERICA, Noted for Consideration: May 3, 2023 13 Defendant. 14 **JOINT STIPULATION** 15 16 The parties hereby jointly STIPULATE AND AGREE to extend the remaining pretrial 17 deadlines and trial date, which were originally set forth in the Court's November 4, 2022, Minute Order Setting Trial Date and Related Dates (Dkt. 10), as set forth below. 18 19 **Proposed New Deadline Current Deadline Deadline** 20 Disclosure of expert testimony under May 24, 2023 June 23, 2023 FRCP 26(a)(2) 21 Good cause exists for extending these specific deadlines. Although the parties have 22 conducted extensive discovery to date, including collection of thousands of pages of medical 23 records, additional time is needed to finalize expert reports and disclosures. Defendant's attorney

STIPULATED MOTION AND ORDER FOR EXTENSION OF PRETRIAL DEADLINES [2:22-cv-00985-JHC] - 1

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UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970

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1	will be out of the country and unavailable for the last two weeks of May. During this time	
2	Defandant's counsel will not be able to access critical documents, including Plaintiff's medica	
3	records. Accordingly, Defendant needs additional time to finalize expert reports and prepare it	
4	expert disclosure. An extension of the expert disclosure deadline will not impact the discover	
5	closure or trial deadlines as the parties do not believe the remaining dates need to be extended.	
6	For the reasons set forth above, the parties believe that there is good cause to request a	
7	extension of the above-listed dates and respectfully request that the Court grant their motion.	
8	SO STIPULATED.	
9	DATED this 3rd day of May, 2023.	
10	NICHOLAS W. BROWN CN United States Attorney	MG LAW
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12 13	WHITNEY PASSMORE, FL No. 91922 Assistant United States Attorney United States Attorney's Office Sea	Tyler Goldberg-Hoss (LER GOLDBERG-HOSS, WSBA No. 41653) 5 NE 100th Street, Suite 220 (attle, WA 98125)
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15	Email: whitney.passmore@usdoj.gov Att	orney for Plaintiff
16		
17	1 certify that this memorandum contains	
18	206 words, in compliance with the Local Civil Rules.	
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STIPULATED MOTION AND ORDER FOR EXTENSION OF PRETRIAL DEADLINES [2:22-cv-00985-JHC] - 2 UNITED STATES ATTORNEY 700 Stewart Street, Suite 5220 Seattle, Washington 98101-1271 206-553-7970

ORDER

It is hereby ORDERED that the parties' motion is GRANTED. The new pretrial deadline is as follows:

<u>Deadline</u>	
Disclosure of expert testimony under FRCP 26(a)(2)	June 23, 2023

DATED this 3rd day of May, 2023.

JOHN H. CHUN

United States District Judge